

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WISCONSIN

DEBORAH LAUFER, Individually,

Plaintiffs,

v.

Case No. 3:20-cv-745

KRISHNA REAL ESTATE 4 LLC,  
Defendants.

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**PLAINTIFF’S RESPONSE TO DEFENDANT’S MOTION TO DISMISS AS WELL  
AS PLAINTIFF’S MOTION TO TRANSFER VENUE**

Plaintiff, by and through her attorneys, respectfully moves this Court to: (1) deny Defendant’s Motion to Dismiss; and (2) transfer this case to the Eastern District of Wisconsin. The undersigned mistakenly filed the instant matter with this Court. As explained by Defendant in its Motion to Dismiss, venue cannot properly be laid in the Western District of Wisconsin because no party to this case resides in this District, and venue is improper here under 28 U.S.C. § 1391(e)(1)(B) because no substantial part of the events or omissions giving rise to plaintiffs’ claims occurred in this District.

Pursuant to 28 U.S.C § 1406(a), this Court may transfer this case in the interest of justice to a district in which it could have been brought. Accordingly, Plaintiff respectfully requests that this Court deny transfer this action to the Eastern District of Wisconsin, in which Defendant's hotel is located.

Respectfully submitted,

Attorneys for Plaintiff:

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